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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GEOFF WINKLER, as Receiver for
PROFIT CONNECT WEALTH
SERVICES, INC.,

Plaintiff,

v.

WILLIAM ROSHAK, individually and
d/b/a WILLIAM GEORGE PHOTOGRAPHY,
MELISSA ROSHAK, TETIANA LUZHANSKA,
DOES 1-10 and ROES 1-10;

Defendants,

And

TINA M. LEISS, as Executive Officer of
the Public Employee's Retirement
System of Nevada,

Nominal Defendant.

CASE NO. 2:21-cv-02000-JAD-BNW

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT MELISSA
ROSHAK TO RESPOND TO
COMPLAINT (ECF No. 1)**

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Plaintiff Geoff Winkler, as Receiver for Profit Connect Wealth Services, Inc. and any of its subsidiaries and affiliates, and Defendant Melissa Roshak stipulate and agree that Ms. Roshak has up to and including January 10, 2022 to respond to the Complaint (ECF No.1), so that Ms. Roshak may further investigate the claims in the Complaint and the parties may try to enter into an early resolution of those claims. Ms. Roshak was served on November 9, 2021, and the current deadline to file a response is December 31, 2021. Therefore, pursuant to LR IA 6-1, this stipulation is timely.

This is the second request for an extension, and it is made in good faith and not for purposes of delay.

Dated this 16th day of December, 2021.

BALLARD SPAHR LLP

/s/ Maria A. Gall

Maria A. Gall, Esq. (14200)
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135

*Attorneys for Plaintiff Geoff Winkler, as
Receiver of Profit Connect*

Dated this 16th day of December, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Stewart C. Fitts

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*Attorneys for Defendant
Melissa Roshak*

ORDER

IT IS SO ORDERED:

DATED: December 17, 2021.


UNITED STATES MAGISTRATE JUDGE

Sarah Ramo

From: Stewart C. Fitts
Sent: Thursday, December 16, 2021 1:56 PM
To: Sarah Ramo
Cc: Joseph R. Ganley
Subject: RE: Winkler v. Roshak - SAO to Extend Time for Answer

Thank you., Sarah.

Please affix my electronic signature. Please add today's date to my signature and that of Maria's. Then submit for filing, and copy Maria and me.

Thank you.

From: Sarah Ramo <sramo@hutchlegal.com>
Sent: Thursday, December 16, 2021 11:33 AM
To: Stewart C. Fitts <sfitts@hutchlegal.com>
Cc: Joseph R. Ganley <JGanley@hutchlegal.com>
Subject: RE: Winkler v. Roshak - SAO to Extend Time for Answer

For your review and revisions.

<G:\R\Roshak, Melissa\Pleadings\2021-12-13 Stipulation for Extension of Time.docx>

From: Stewart C. Fitts <sfitts@hutchlegal.com>
Sent: Thursday, December 16, 2021 9:43 AM
To: Sarah Ramo <sramo@hutchlegal.com>
Cc: Joseph R. Ganley <JGanley@hutchlegal.com>
Subject: FW: Winkler v. Roshak - SAO to Extend Time for Answer

Sarah:

Please see Maria Gall's email below. Please revised the 12/13/21 draft of the SOA for extension of time to reflect the reassignment of the case to the new judge (Jennifer Dorsey) and Magistrate (Brenda Weksler).

Thank you.

From: Joseph R. Ganley <JGanley@hutchlegal.com>
Sent: Thursday, December 16, 2021 3:42 AM
To: Stewart C. Fitts <sfitts@hutchlegal.com>
Cc: Sarah Ramo <sramo@hutchlegal.com>
Subject: FW: Winkler v. Roshak - SAO to Extend Time for Answer

All yours Stewart and Sarah, thanks.

From: Gall, Maria A. <GallM@ballardspahr.com>
Sent: Wednesday, December 15, 2021 5:31 PM
To: Stewart C. Fitts <sfitts@hutchlegal.com>
Cc: Joseph R. Ganley <JGanley@hutchlegal.com>; Kaci Chappuis <kchappuis@hutchlegal.com>; Sarah Ramo <sramo@hutchlegal.com>
Subject: RE: Winkler v. Roshak - SAO to Extend Time for Answer

Hi Stewart.

My only comments are: (1) that the case was reassigned to Judge Dorsey earlier today, and so I think the case number needs to be updated to be 2:21-cv-02000-JAD-BNW; and (2) I think it's the magistrate judge that will sign the stipulation. You can otherwise affix my /s/ signature and file. Thanks!

Maria

From: Stewart C. Fitts <sfitts@hutchlegal.com>
Sent: Wednesday, December 15, 2021 2:12 PM
To: Gall, Maria A. (LV) <GallM@ballardspahr.com>
Cc: Joseph R. Ganley <JGanley@hutchlegal.com>; Kaci Chappuis <kchappuis@hutchlegal.com>; Sarah Ramo <sramo@hutchlegal.com>
Subject: Winkler v. Roshak - SAO to Extend Time for Answer

 **EXTERNAL**

Dear Maria:

Attached is a draft of the SAO to extend the January 3, 2022 deadline for Melissa Roshak's responsive for a period of one week until January 10, 2022. My apologies for the delay, as I have been out of the office. Please advise whether you approve and if we have your authority to affix your electronic signature. If so, we will submit to the Court.

Thank you.

Stewart C. Fitts
Senior Counsel



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